

Allison A. Davis (CA State Bar No. 139203)
 Sanjay Nangia (CA State Bar No. 264986)
 DAVIS WRIGHT TREMAINE LLP
 505 Montgomery Street, Suite 800
 San Francisco, California 94111
 Telephone: (415) 276-6500
 Facsimile: (415) 276-6599
 Email: allisondavis@dwt.com; sanjaynangia@dwt.com

Nick S. Verwolf (*pro hac vice*)
 DAVIS WRIGHT TREMAINE LLP
 777 – 108th Ave. N.E., Suite 2300
 Bellevue, WA 98004
 Telephone: (425) 646-6125
 Facsimile: (425) 646-6199
 Email: nickverwolf@dwt.com

Attorneys for SANYO Consumer Electronics Co., Ltd.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

Master File No. 3:07-md-1827-SI
 (Case No. 2:11-cv-03856-SI)

This Document Relates to:

**STIPULATION AND [PROPOSED]
 ORDER REGARDING RULE 30(B)(6)
 DEPOSITION OF SANYO CONSUMER
 ELECTRONICS CO., LTD AND FACT
 DISCOVERY CUT-OFF**

Motorola, Inc. v. AU Optronics Corporation,
 et al., 3:09-cv-5840 SI

AT&T Mobility LLC, et al. v. AU Optronics
Corporation, et al., 3:09-cv-4997 SI

Target Corporation, et al., v. AU Optronics
Corporation, et al., 3:10-cv-4945 SI

Defendant SANYO Consumer Electronics Co., Ltd., (“Sanyo Consumer Electronics”) and
 Plaintiffs Motorola Mobility, Inc.; AT&T Mobility LLC; AT&T Corp.; AT&T Services, Inc.;
 Bellsouth Telecommunication, Inc.; Pacific Bell Telephone Company; AT&T Operations, Inc.;
 AT&T Datacomm, Inc.; Southwestern Bell Telephone Company; Target Corp.; Sears, Roebuck and

1 Co.; Kmart Corp.; Old Comp Inc.; Good Guys, Inc.; RadioShack Corp; and Newegg Inc.;
2 ("Plaintiffs") stipulate as follows:

3 WHEREAS on November 2, 2011, Plaintiffs made a request to Sanyo Consumer Electronics
4 to take a Rule 30(b)(6) deposition of Sanyo Consumer Electronics;

5 WHEREAS the discovery cut-off in the Direct Action Plaintiffs' track one cases is
6 December 8, 2011;

7 WHEREAS Plaintiffs first named Sanyo Consumer Electronics in their respective
8 Complaints only recently;

9 WHEREAS the parties have had limited time to conduct discovery;

10 WHEREAS Plaintiffs and Sanyo Consumer Electronics have met and conferred regarding
11 scheduling the Rule 30(b)(6) deposition of Sanyo Consumer Electronics; and

12 WHEREAS the Rule 30(b)(6) deponent for Sanyo Consumer Electronics resides in Tottori,
13 Japan and will be traveling a significant distance to San Francisco in order to attend the deposition;

14 THEREFORE, Sanyo Consumer Electronics, by its counsel, and Plaintiffs, by the
15 undersigned counsel, stipulate and agree as follows:

16 1. The fact discovery cutoff date of December 8, 2011 set forth in the Order Modifying
17 Pretrial Schedule for "Track One" Direct Action Plaintiff and State Attorney General Cases (MDL
18 Dkt. No. 3110) is extended up to and including December 15, 2011, solely as to the deposition of
19 Yasushi Nakao, the designated Rule 30(b)(6) deponent for Sanyo Consumer Electronics.

20 2. This deposition shall take place on December 14-15, 2011 at the offices of Davis
21 Wright Tremaine LLP in San Francisco.

22 3. Sanyo Consumer Electronics and Plaintiffs have on-going disputes over the
23 appropriate scope of this deposition. Discussions regarding these issues are continuing and the
24 parties hope that they will be able to reach agreement. If not, any remaining disputes will be
25 presented to the Special Master. If any disputes arise at the deposition, Plaintiffs will have five
26 court days to move to compel further responses.

1 **IT IS SO STIPULATED.**

2 DATED: November 29, 2011

/s/ Allison A. Davis

Allison A. Davis (SBN 139203)
DAVIS WRIGHT TREMAINE LLP
505 Montgomery Street, Suite 800
San Francisco, CA 94111-6533
Telephone: (415) 276-6500
Facsimile: (415) 276-6599
Email: allisondavis@dwt.com

Nick S. Verwolf (*pro hac vice*)
DAVIS WRIGHT TREMAINE LLP
777 108th Ave. N.E., Suite 2300
Bellevue, WA 98004
Telephone: (425) 646-6125
Facsimile: (425) 646-6199
Email: nickverwolf@dwt.com

Counsel for Defendant Sanyo Consumer Electronics Co., Ltd.

/s/ Jason C. Murray

Jason C. Murray
CROWELL & MORRING LLP
515 South Flower St., 40th Floor
Los Angeles, CA 90071
Tel: (213) 622-4750
Fax: (213) 622-2690
Email: jmurray@crowell.com


Jerome A. Murphy
CROWELL & MORRING LLP
1001 Pennsylvania Ave., NW
Tel: (202) 624-2500
Fax: (202) 628-5116
Email: jmurphy@crowell.com

Counsel for Plaintiffs Motorola Mobility Inc.; AT&T Mobility LLC, et al.; Target Corporation, et al.

Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from stipulating defendants.


IT IS SO RECOMMENDED.

Dated: 11/29, 2011


Martin Quinn, Special Master

IT IS SO ORDERED.

Dated: 11/30, 2011


Hon. Susan Illston, United States District Judge